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June 24, 2025

MEMORANDUM ENDORSED

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Telebrands Corp. and Ningbo Fine Source Imp&Exp Co., Ltd*
Case No. 25-cv-1557 (GHW)
Request for Extension of Time to File Default Judgment Motion

Dear Judge Woods,

We represent Plaintiff Telebrands Corp. (“Plaintiff”) in the above-referenced action (the “Action”).¹ On May 22, 2025, the Court entered an Order directing, *inter alia*, that any application for an order to show cause why default judgment should not be entered against Defendant (“Default Judgment Motion”) must be filed no later than June 30, 2025 (“May 22, 2025 Order”). (Dkt. 29). For the reasons set forth herein, Plaintiff respectfully requests that the Court extend Plaintiff’s deadline to file its Default Judgment Motion. In accordance with Your Honor’s Individual Rules of Practice, Plaintiff submits the following:

1. **Original Due Date:** Plaintiff’s current deadline to file its Motion for Default Judgment is June 30, 2025.
2. **The number of previous requests for adjournment:** None, this is Plaintiff’s first request for an extension of time to file its Default Judgment Motion.
3. **The reason for the current request:** Plaintiff respectfully requests a two (2) month extension to file its Default Judgment due to Plaintiff’s counsel’s current high-volume caseload, as well as overlapping summer vacation schedules creating difficulties with availability and workload. Extending the deadline for Plaintiff to file its Default Judgment Motion to August 30, 2025 will alleviate the challenges associated with the summer months.
4. **Whether the adversary consents:** Given that Defendant is in default, Plaintiff did not seek Defendant’s consent.
5. **Proposed alternative dates:** Plaintiff respectfully requests to file its Default Judgment Motion by August 30, 2025.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,


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Attorneys for Plaintiff

The Court expects that Plaintiff will file an application for an order to show cause why default judgment should not be granted in this matter no later than August 30, 2025. The initial pretrial conference scheduled for July 28, 2025 is adjourned *sine die*. Plaintiff is directed to serve a copy of this order on Defendant and to retain proof of service. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 31.

SO ORDERED.

Dated: June 24, 2025
New York, New York



GREGORY H. WOODS
United States District Judge